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Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to  
47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1**

Dear FCC,

A major component of the Telecommunications Act of 1996 was local loop unbundling, to foster competition in the PUBLIC broadband space.

Other countries, like France, utilized this model for successfully serving its citizens (users in Paris can now get TV, broadband and phone service for a small fraction of what users in the States pay).

The Electronic Freedom Foundation cites recent studies showing that small ISPs have accounted for nearly half of all fiber deployment in recent years. Cutting off these smaller ISPs' fledgling access to incumbent networks will stifle a huge number of efforts aimed at shoring up connectivity shortcomings. The EFF's Katharine Trendacosta writes,

"With their forbearance petition, big ISPs are seeking to end a requirement that creates competition and spurs better and faster Internet coverage. New ISPs use the guaranteed access to copper lines to get a foothold in a market and to build capital. And then its these local ISPs that build high-speed infrastructure and cover rural areas. These are two things not being done by big ISPs, who would have even less incentive to do anything if these local ISPs vanish."

The FCC should be acting in the PUBLIC interest in managing PUBLIC broadband space, to expand coverage and reduce the digital divide that leaves too many Americans in the dark.

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